

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO. 19-04599 MJ
v. Kwame Little DOB: 1988; United States	MAGISTRATE'S CASE NO.

Complaint for violation of Title 8, United States Code §§ 1324(a)(1)(A)(ii) & 1324(a)(1)(B)(i); 1325; 18 USC § 2

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

COUNT 1 (Felony) On or about July 26, 2019, at or near Sierra Vista, in the District of Arizona, **Kwame Little**, knowing or in reckless disregard that certain alien namely Osvaldo Jonathan Pacheco-Pirin had come to, entered, and remained in the United States in violation of law, did transport, said alien within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of **Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i)**.

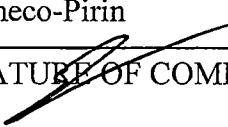
COUNT 2 (Misdemeanor) On or about July 26, 2019, at or near Sierra Vista, in the District of Arizona, **Kwame Little**, did unlawfully aid and abet certain illegal alien, namely Osvaldo Jonathan Pacheco-Pirin, by assisting or encouraging the alien(s) to enter the United States at any time or place other than as designated by immigration officers; in violation of **Title 8, United States Code, Section 1325 and Title 18, United States Code, Section 2**.

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about July 26, 2019, at or near Sierra Vista, in the District of Arizona, a United States Border Patrol Agent was riding with a Department of Public Safety Officer. They both observed a 2016 Hyundai Elantra parked at the Blue Horizon Motel. The Blue Horizon Hotel has been identified as an area that has been frequently used to pick up and store illegal aliens. Record checks revealed that the Elantra was registered to a car rental company. The officer followed the Elantra and observed it exceed the posted speed limit. The officer conducted a vehicle stop and identified the driver as **Kwame Little**, a United States Citizen. BPA performed an immigration inspection on the passenger and determined that he was in the United States illegally.

Material witness Osvaldo Jonathan Pacheco-Pirin stated that he had made arrangements to be smuggled into the United States for money. Pacheco stated he crossed the International Boundary Fence and walked for two days. Pacheco stated he was picked up by a white sedan driven by a Caucasian male and was subsequently transferred to another vehicle driver by **Little**. Pacheco stated that **Little** took him to a hotel room in Douglas where he stayed the rest of the night. The following morning **Little** came back to the hotel room and instructed him to get in his vehicle. After a short ride, they were stopped by the police and arrested by an agent.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Osvaldo Jonathan Pacheco-Pirin

DETENTION REQUESTED COMPLAINT REVIEWED by AUSA CHR/ri _____	SIGNATURE OF COMPLAINANT 
<i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	OFFICIAL TITLE & NAME: U.S. Border Patrol Agent

Sworn to before me and subscribed in my presence.

SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE July 29, 2019
--	-----------------------

¹⁾ See Federal Rules of Criminal Procedure Rule 3 and 54